

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
ECF CASE**

SOKOL HOLDINGS, INC., BRIAN SAVAGE	}	
and THOMAS SINCLAIR	}	
	}	
Plaintiffs,	}	
v.	}	Case No. 05-cv-3749 (KMW)
BMB MUNAI, INC., ALEXANDRE AGAIAN,	}	
BAKHYTEK BAISEITOV, GEORGES	}	
BENARROCH, BORIS CHERDABAYEV,	}	
MIRGALI KUNAYEV, CREDIFINANCE	}	
CAPITAL, INC. and CREDIFINANCE	}	
SECURITIES, LTD.	}	
	}	
Defendants.	}	

**DECLARATION OF STEVEN G. TYSON IN SUPPORT OF
PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE**

I, Steven G. Tyson, Esquire, hereby declare as follows:

1. I am an associate at Marcus & Auerbach LLC, counsel for plaintiffs in the above referenced matter.
2. I am submitting this declaration in support of Plaintiffs' Response to this Court's Order to Show Cause, dated September 22, 2010. The grounds for Plaintiffs' Response are fully set forth in the accompanying Memorandum of Law.
3. For the Court's use in deciding Defendants' Motions in Limine at issue in this Court's Order to Show Cause, I attach true and correct copies of the following documents as exhibits to Plaintiffs' Response to the Order to Show Cause.
4. Attached as Exhibit 1 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, pp. 407-408.

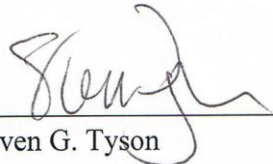
5. Attached as Exhibit 2 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, pp. 419-420.
6. Attached as Exhibit 3 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, pp. 443-445.
7. Attached as Exhibit 4 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, pp. 430-431.
8. Attached as Exhibit 5 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, pp. 104-145.
9. Attached as Exhibit 6 is a true and correct copy of Kunayev Deposition Exhibit 6, receipt of funds paid to Tolmakov (handwritten in Russian).
10. Attached as Exhibit 7 is a true and correct copy of certified and notarized translation of Kunayev Deposition Exhibit 6.
11. Attached as Exhibit 8 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, pp. 411-415.
12. Attached as Exhibit 9 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, p. 424.
13. Attached as Exhibit 10 is a true and correct copy of excerpt of deposition transcript of Mirgali Kunayev, p. 434.
14. Attached as Exhibit 11 is a true and correct copy of Benarroch Deposition Exhibit 11, Memorandum dated June 12, 2003, from Agaian to Benarroch.
15. Attached as Exhibit 12 is a true and correct copy of excerpt of deposition transcript of Georges Benarroch, p. 107.

16. Attached as Exhibit 13 is a true and correct copy of excerpt of deposition transcript of Georges Benarroch, p. 109.

17. Attached as Exhibit 14 is a true and correct copy of excerpt of deposition transcript of Georges Benarroch, pp. 114-115.

I declare that the foregoing is true and correct, and that if anything herein is willfully false, I am subject to the penalty for perjury.

Date: September 22, 2010


Steven G. Tyson